

# LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1650 TYSONS BOULEVARD, SUITE 1500

MCLEAN, VIRGINIA 22102

703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS\*

DAVID L. NACE

THOMAS GUTIERREZ\*

ELIZABETH R. SACHS\*

GEORGE L. LYON, JR.

PAMELA L. GIST

DAVID A. LAFURIA

B. LYNN F. RATNAVALE\*

TODD SLAMOWITZ\*

STEVEN M. CHERNOFF\*

CONSULTING ENGINEERS

ALI KUZEHKANANI

LEROY A. ADAM

LEILA REZANAVAZ

SUMEET K. BHALOTIA

OF COUNSEL

JOHN J. MCAVOY\*

J.K. HAGE III\*

LEONARD S. KOLSKY\*

HON. GERALD S. MCGOWAN\*

TAMARA DAVIS-BROWN\*

\*NOT ADMITTED IN VA

Writer's Direct Dial

(703) 584-8665

pgist@fcclaw.com

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February 1, 2006

RECEIVED

FEB - 1 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

Re: CC Docket 94-102  
E911 Handset Penetration Quarterly Report  
California RSA No. 3 Limited Partnership d/b/a Golden State Cellular

Dear Ms. Dortch:

On behalf of California RSA No. 3 Limited Partnership d/b/a Golden State Cellular ("Golden State"), there is submitted herewith a report of the status of the carrier's progress in achieving 95% systemwide handset of location-capable handsets.

Golden State is a Tier III digital wireless carrier operating cellular radiotelephone services in California RSA 3. This report is submitted in compliance with the terms of the *Order*, CC Docket No. 94-102, FCC 05-201, released December 15, 2005, conditionally granting Golden State an extension through December 15, 2006, of the deadline for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

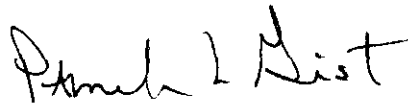
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Federal Communications Commission  
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Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Pamela L. Gist". The signature is written in a cursive, flowing style.

Pamela L. Gist

**CALIFORNIA RSA NO. 3 LIMITED PARTNERSHIP  
D/B/A  
GOLDEN STATE CELLULAR**

**E911 REPORT**

**FEBRUARY 1, 2006**

The following information is submitted in accordance with FCC directive:

**1. The number and status of Phase II requests from Public Safety Answering Points**

A total of five PSAPs are located within Golden State Cellular's service area. Two have requested Phase II services: Calaveras County Sheriff's Office submitted a request for Phase II services on October 4, 2005, and Mariposa County Sheriff's Office submitted a request for Phase II services on October 6, 2005. Both are considered invalid. The California Highway Patrol reviews all PSAP requests for Phase II services because all E911 calls are routed to either the California Highway Patrol or to the Yosemite National Patrol. The California Highway Patrol determined that all of Golden State Cellular's E911 Phase II call data applicable to the Calaveras and Mariposa County PSAPs will be delivered to the California Highway Patrol, rather than to the Sheriffs' Offices. The California Highway Patrol therefore invalidated the requests submitted by the Calaveras and Mariposa County PSAPs to Golden State Cellular. Instead, the California Highway Patrol will submit to Golden State Cellular its own overriding request for Phase II services for Calaveras and Mariposa Counties. This request has not been received, but when it is Golden State Cellular will have the authority it needs to go into action for Phase II delivery, including placing an order with SBC

Communications, Inc. (now AT&T) to obtain trunk lines. Golden State Cellular will utilize the services of TCS to install and test all equipment necessary to transmit E911 data to the California Highway Patrol. TCS is preparing to operate the location database and to optimize E911 performance on Golden State Cellular's CDMA network system. At present, TCS is confirming the routing required by the California Highway Patrol for Calaveras and Mariposa Counties. TCS has determined that the California Highway Patrol has become capable of receiving and utilizing Phase II data.

**2. The estimated dates on which Phase II service will be available to PSAPs served by Golden State Cellular's wireless network**

Golden State Cellular expects to begin providing Phase II services for Calaveras and Mariposa Counties within six months of receipt of a request from the California Highway Patrol. A request is expected to be received sometime in February 2006.

**3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates**

Golden State Cellular is actively working with PSAP officials with regard to the carrier's progress in achieving a higher location-capable handset penetration rate. Jan Opie, Product Development Manager for Golden State Cellular stays in regular contact with William Harry, Wireless E911/GIS Project Coordinator for the E911 Emergency Communications Office, Department of General Services of the State of California. Mr. Harry is the single point of contact for carriers

concerning wireless E911 matters. Ms. Opie specifically keeps Mr. Harry updated on Golden State Cellular's penetration rate and Phase II deployment matters.

#### **4. Efforts to encourage customers to upgrade to location-capable handsets**

Golden State Cellular has adopted a plan to notify customers as to which PSAP areas located within Golden State Cellular's service area will be capable of receiving and processing the Phase II E911 data received from Golden State Cellular, and when the other PSAPs are expected to become capable. By means of billing inserts, print advertising and website postings, customers will be informed that by upgrading their handsets they will have the ability to automatically transmit their location information to emergency officials when they call 911.

At the same time, promotional campaigns to encourage handset upgrades have been conducted in print ads and billing inserts, and by phone calls to customers. Special offers are promoted on Golden State Cellular's web site and by signage on premises. The ads emphasize the benefit of early renewal for analog customers who trade in their old handsets. The campaigns offer free phone upgrades and discounts, and promotions for phones with cameras, ringtones, color screens and other features help entice customers to upgrade their handsets. The newer campaigns will advertise the safety and coverage advantages of the CDMA system, and will emphasize as a feature of the new phones their location assistance capabilities in the event of emergency.

**5. The extent of subscribers located in areas with analog service only**

As of January 18, 2006, a total of 875 of Golden State Cellular's customers, representing 5.41% of subscribers, resided in areas served by analog signal only. 6.38% of all minutes of use occurred on the analog signal, and 9.49% of calls were placed on the analog system. A map of Golden State Cellular's CDMA coverage area is attached. The areas not covered are served by analog signal only.

**6. The percentage of customers with location-capable phones**

At this time, 69% of Golden State Cellular's subscribers are using Phase II location-capable handsets. The percentage rate has risen eight percentage points over the last four months.

**7. Status in achieving compliance and whether Golden State Cellular is on schedule to meet its revised deadline of 12/15/06**

Golden State Cellular maintains its policy of selling and activating only location-capable digital handsets. It continues to expand its CDMA network facilities and to conduct marketing campaigns to encourage consumer adoption of new handsets. The rate of increase of the penetration rate of location capable handsets (about 2% per month) will have to be accelerated in order for Golden State Cellular reach the 95% benchmark by December 15, 2006.